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Government & External Affairs
180 S. Clinton Ave.
5th Floor
Rochester, NY 14646

August 13, 2009

Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: TRA Docket No. 09-00110
Section 254(e) Certification of Citizens Telecommunications Company of Tennessee LLC
and Citizens Telecommunications Company of the Volunteer State LLC to Receive USF
Disbursements in Calendar Year 2010

Dear Chairman Kyle:

Enclosed please find:

1. Certification letters signed by Gregg C. Sayre.
2. Statements of 2008 federal Universal Service receipts subject to certification and the 2008 expenditures for provision, maintenance and upgrading of facilities and services supported by federal Universal Service funding.
3. 13 copies of each filing.

If there are any questions, please feel free to contact me at 585-777-5823.

Sincerely,

Deborah Fasciano
Government & External Affairs

Enclosure

August 13, 2009

Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: TRA Docket No. 09-00110
Section 254(e) Certification of Citizens Telecommunications Company of Tennessee LLC
to Receive USF Disbursements in Calendar Year 2010

Dear Chairman Kyle:

I, Gregg C. Sayre, Assistant Secretary of Citizens Telecommunications Company of Tennessee LLC (the "Company"), do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

1. I am the Assistant Secretary of the Company;
2. The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37), subject to the jurisdiction of the Tennessee Regulatory Authority; The SAC # is 294336
3. The Company is eligible for disbursements from the federal Universal Service Fund ("USF") as prescribed by the Federal Communications Commission ("FCC"); and
4. The Company will utilize its USF disbursements for all federal high-cost support, including high-cost loop support, local switching support, high-cost support received pursuant to the purchase of exchanges, high-cost model support, and hold harmless support, will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) of the Telecommunications Act of 1996.

Sincerely yours,



Gregg C. Sayre
Assistant Secretary

Citizens Telecommunications Company of Tennessee

Year 2008 Federal Universal Service Receipts Subject To Certification.

1 High cost loop support	\$600
2 Local switching support	<u>\$0</u>
3 TOTAL	\$600

Year 2008 Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding

Plant Specific Operations Expenses	Actual 2008			
4 Network support (Accts. 6110-16)	\$780			
5 General support (Accts. 6120-24)	\$2,474,265		\$24,002,924	75.7%
6 Central office (Accts. 6210-6215)	\$1,446,386		\$3,593,635	11.3%
7 Cable and wire facilities (Accts. 6410-6441)	\$3,593,635		\$4,116,332	13.0%
8 Network operations (Accts. 6530-35)	\$3,173,128		\$31,712,891	100.0%
9 Depreciation & amortization (Accts. 6560-65)	\$11,176,513		\$31,712,891	
10 Customer Operations Expenses				
11 Customer services (Accts. 6620-23)	\$2,705,914			
Corporate Operations Expenses				
12 Executive and planning (Accts. 6710-12)	\$403,918			
13 General and administrative (Accts. 6720-28)	\$2,622,020			
14 Total Year 2008 Supported Expenses, Before Return on Investment	\$27,596,559			
Additions				
15 Total central office switching (Acct. 2210)	\$172,678			
16 Total cable and wire (Acct. 2410)	\$3,943,654			
17 TOTAL	\$4,116,332			
18 Total Year 2008 Supported Expenditures Before Return On Investment	\$31,712,891			

August 13, 2009

Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

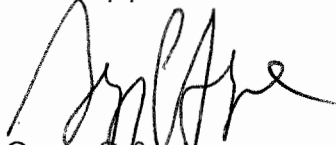
Re: TRA Docket No. 09-00110
Section 254(e) Certification of Citizens Telecommunications Company of the Volunteer
State LLC to Receive USF Disbursements in Calendar Year 2010

Dear Chairman Kyle:

I, Gregg C. Sayre, Assistant Secretary of Citizens Telecommunications Company of the Volunteer State LLC (the "Company"), do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

1. I am the Assistant Secretary of the Company;
2. The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37), subject to the jurisdiction of the Tennessee Regulatory Authority; The SAC # is 290580
3. The Company is eligible for disbursements from the federal Universal Service Fund ("USF") as prescribed by the Federal Communications Commission ("FCC"); and
4. The Company will utilize its USF disbursements for all federal high-cost support, including high-cost loop support, local switching support, high-cost support received pursuant to the purchase of exchanges, high-cost model support, and hold harmless support, will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) of the Telecommunications Act of 1996.

Sincerely yours,



Gregg C. Sayre
Assistant Secretary

Citizens Telecommunications Company of the Volunteer State

Year 2008 Federal Universal Service Receipts Subject To Certification.

1 High cost loop support	\$0
2 Local switching support	\$267,183
3 TOTAL	\$267,183

Year 2008 Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding

Plant Specific Operations Expenses	Actual 2008		
4 Network support (Accts. 6110-16)	\$208		
5 General support (Accts. 6120-24)	\$684,552		\$6,514,289
6 Central office (Accts. 6210-6215)	\$251,421		\$683,611
7 Cable and wire facilities (Accts. 6410-6441)	\$683,611		\$1,341,480
8 Network operations (Accts. 6530-35)	\$825,913		\$8,539,380
9 Depreciation & amortization (Accts. 6560-65)	\$3,120,011		\$8,539,380
10 Customer Operations Expenses			
11 Customer services (Accts. 6620-23)	\$928,983		
Corporate Operations Expenses			
12 Executive and planning (Accts. 6710-12)	\$106,108		
13 General and administrative (Accts. 6720-28)	\$597,093		
14 Total Year 2008 Supported Expenses, Before Return on Investment	\$7,197,900		
Additions			
15 Total central office switching (Acct. 2210)	\$111,591		
16 Total cable and wire (Acct. 2410)	\$1,229,889		
17 TOTAL	\$1,341,480		
18 Total Year 2008 Supported Expenditures Before Return On Investment	\$8,539,380	Maintenance Provision Upgrade Total	76.3% 8.0% 15.7% 100.0%